

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,	Case No. 23-00623 (TJC)
Debtors.	Jointly Administered
	Objection Deadline: 04/29/2024 at 4:00 pm (CT)

**SUMMARY OF FIRST FEE APPLICATION OF DAY RETTIG MARTIN, P.C. AS
COUNSEL TO THE OFFICIAL COMMITTEE OF PENSIONERS FOR ALLOWANCE
OF COMPENSATION AND REMIMBURMENT OF EXPENSES FOR THE PERIOD
FROM NOVEMBER 4, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant: Day Rettig Martin, P.C.

Authorized to Provide Professional Services to: Official Committee of Pensioners

Date of Retention: November 4, 2023

Date of Order Authorizing Retention: November 13, 2023, Doc. 506

Period for which Compensation and Reimbursement is Sought: November 4, 2023 through November 30, 2024

Amount of Compensation Sought as Actual, Reasonable and Necessary: \$20,544.00 (80% of \$25,680.00)

Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary: \$0.00

Application Type: Monthly

SUMMARY OF DAY RETTIG MARTIN, P.C. APPLICATIONS FOR COMPENSATION

Application	Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees & Expenses
First	N/A	11/04/23 – 11/30/23	\$20,544.00 (80% of 25,680.00)	\$0.00	N/A

**SUMMARY OF BILLING BY PROFESSIONALS
NOVEMBER 4, 2023 – NOVEMBER 30, 2023**

Name of Professional	Position, Department, Year of Bar Admission	Hourly Billing Rate	Total Billed Hours	Total Compensation
Paula L. Roby	Shareholder, Bankruptcy Bar Admission: 1999	\$375.00	68.30	\$20,340.00 (80% of 25,425.00)
Julie G. Quist	Paralegal	\$150.00	1.70	\$204.00 (80% of 255.00)
TOTALS:			69.50	\$20,544.00 (80% of 25,680.00)

**COMPENSATION BY PROJECT CATEGORY
NOVEMBER 4, 2023 – NOVEMBER 30, 2023**

Project Category	Total Hours	Total Fees
A. Asset Analysis and Recovery	11.00	\$4,125.00
B. Case Administration	7.30	\$2,727.50
C. Court Hearings	5.30	\$1,830.00
D. Employment and Fee Applications	1.50	\$337.50
E. Litigation	0.00	N/A
F. Litigation Planning	1.60	\$600.00
G. Meetings and Communications with Professionals	20.80	\$7,800.00
H. Pension Analysis	5.50	\$2,062.50
I. Plan and Disclosures Statement	0.00	N/A
J. Review Pleadings	16.50	\$6,187.50
K. Other Contested Matters	0.00	N/A
L. Travel (billed at 50%)	0.00	N/A
TOTALS:	69.50	\$25,680.00

EXPENSE SUMMARY
NOVEMBER 4, 2023 – NOVEMBER 30, 2023

Expense Category	Service Provider (if applicable)	Total Expenses
N/A	N/A	N/A
TOTALS:	0.00	\$0.00

Day Rettig Martin, P.C. (the “Applicant” or “DRM”), counsel to the Official Committee of Pensioners (the “Pensioners Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby applies (the “Application”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s *Order Establishing Procedures for Interim Compensation And Reimbursement of Expenses of Professionals* (Doc. 224) (the “Interim Compensation Order”), for allowance of compensation for services rendered and reimbursement of expenses for the period from **November 4, 2023** through **November 30, 2023** (the “Application Period”), and respectfully represents as follows:

1. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b).
2. Venue of the Chapter 11 Case and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.
3. The legal predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and the Interim Compensation Order.

BACKGROUND

A. Formation of the Official Committee of Pensioners

4. On August 7, 2023, (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”) commencing these bankruptcy cases.

5. On September 13, 2023, Paula L. Roby of DRM appeared for a group of Mercy Pensioners (Doc. 212) and on October 4, 2023, for the Mercy Pensioners Ad-Hoc Committee (Doc. 332).

6. On October 18, 2023, counsel for the Mercy Pensioners Ad-Hoc Committee filed a Motion to Establish an Official Committee of Pensioners Under 11 U.S.C. § 1102 (a)(2) (Doc. 385). A hearing on the Motion was held October 27, 2023, and the Motion was granted November 3, 2023 (Doc. 451). The following day, eight members of the Mercy Pensioners Ad-Hoc Committee were appointed to serve as the Official Committee of Pensioners (the “Pensioners Committee”) (Doc. 458).

B. The Retention of Day Rettig Martin, P.C.

7. On November 8, 2023, the Pensioners Committee applied to the Court (Doc. 479) (the “DRM Application”) for an order authorizing it to retain and employ DRM as their counsel, effective as of November 4, 2023. On November 13, 2023, the Court entered an order authorizing such retention (Doc. 506).

RELIEF REQUESTED

8. All services for which compensation is requested were performed for or on behalf of the Pensioners Committee. During the compensation period, DRM received no payment and no promises of payment from any source other than the Debtors for services to be rendered in any capacity in connection with the matters covered by this Application. There is no agreement or

understanding between DRM and any other person, other than members of DRM for sharing of any compensation to be received for services rendered in the Chapter 11 Case.

9. Pursuant to the Interim Compensation Order and Bankruptcy Code section 331, DRM is seeking compensation in the amount of \$20,544.00, which is equal to eighty percent (80%) of the \$25,680.00 in fees for professional services rendered by DRM during the Application Period. This amount is derived solely from the applicable hourly billing rates of DRM's personnel who rendered services to the Debtors. In addition, DRM incurred \$0.00 in out-of-pocket expenses during the Application Period.

A. Compensation Requested

10. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by DRM with respect to the Chapter 11 Case during the Application Period. This detailed itemization complies with the Interim Compensation Order and the Bankruptcy Code in that each time entry contains a separate time allotment, a description of the type of activity, and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

11. The attorney(s) and paraprofessional(s) who rendered services related to each project category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought for each category.

B. Expense Reimbursement

12. DRM incurred out-of-pocket expenses during the Application Period in the amount of \$0.00. Descriptions of the expenses actually occurred are identified in **Exhibit A** in relation to each project category. The expenses are broken down into categories of charges.

13. DRM provided a wide array of legal services to the Pensioners Committee. The services rendered by DRM are separated by project category and are more fully described in the Summary of Services by Project spreadsheet attached to this Application as **Exhibit B**.

CONCLUSION

14. DRM believes that the time entries, rates, and expenses included in **Exhibit A** are reasonable, customary, and in compliance with the requirements of the Bankruptcy Code and the Interim Compensation Order.

15. DRM reserves the right to correct, amend, or supplement this Application, including, without limitation, to seek payment in the event this Application is not approved in full.

WHEREFORE, DRM respectfully requests that the Court enter an order: (i) awarding DRM allowance of (a) eighty percent (80%) of the fees for the Application Period in the amount of \$20,544.00; and (b) the reimbursement of one-hundred percent (100%) of the actual and necessary expenses DRM incurred during the Application Period in the amount of \$0.00; (ii) authorizing and directing the Debtors to pay DRM \$20,544.00, representing the total amount owed for the Application Period; and (iii) granting such other relief as is just and proper.

Dated: April 15, 2024

Respectfully submitted,
DAY RETTIG MARTIN, P.C.

/s/ Paula L. Roby
Paula L. Roby AT0006749
Telephone: (319) 365-0437
FAX: (319) 365-5866
E-mail: paula@drpjlaw.com
ATTORNEY FOR THE
OFFICIAL COMMITTEE OF PENSIONERS

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this April 15, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Julie G. Quist

Day Rettig Martin, P.C.

150 1st Avenue NE Suite 415

P. O. Box 2877

Cedar Rapids IA 52406-2877

Phone: 319-365-0437 Fax: 319-365-5866

Mercy Pensioners Committee

Statement Date: April 15, 2024

Statement No. 123219

Account No. 100082.01

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Fees

			Rate	Hours	
11/04/2023	PLR	E-mail correspondence with United States Trustee's office.	375.00	0.10	37.50
	PLR	Receive and review United States Trustee's Appointment of Official Committee of Pensioners.	375.00	0.10	37.50
	PLR	Continued e-mail correspondence with Official Committee of Pensioners.	375.00	0.50	187.50
	PLR	Review First Day Motions.	375.00	2.10	787.50
	PLR	Attention to status of Pension funds, lack of Trust account.	375.00	0.60	225.00
11/05/2023	PLR	Prepare for 11/06/23 Hearing.	375.00	2.50	937.50
	PLR	Correspondence with Attorney Eric Lam regarding Foundation issues.	375.00	0.40	150.00
	PLR	Receive and review of filings including Motion in Limine, Witness and Exhibit Lists, Response to Objection filed by Bond Holder, Declaration.	375.00	1.40	525.00
	PLR	Background case filings review.	375.00	2.50	937.50
	PLR	Review Pension Plan Instrument regarding Trust.	375.00	0.40	150.00
11/06/2023	JGQ	Prepare Hearing binder for Attorney Paula Roby.	150.00	0.70	105.00
	PLR	Participate in Hearing on Cash Collateral, Automatic Stay, Motion to Sell, Cash Management, and Rule 9019.	375.00	2.10	787.50
	PLR	Correspondence with Committee regarding Hearing.	375.00	0.60	225.00
	PLR	Meet with Parties in Interest following Hearing.	375.00	0.70	262.50
	PLR	Receive and review correspondence from Ron Winters of Gibbins Advisors, LLC regarding Financial Advisor needs.	375.00	0.20	75.00
	PLR	Receive and review correspondence from Attorney Jeffrey Goetz regarding Financial Advisor needs.	375.00	0.10	37.50
	PLR	Attention to Application to Employ Day Rettig Martin, P.C. for Official Committee of Pensioners.	375.00	0.20	75.00
	PLR	Receive and review full list of Pensioners from Debtors; forwarded same to Official Committee of Pensioners.	375.00	0.40	150.00
	PLR	Correspondence with Official Committee of Pensioners regarding handling of list, mailings.	375.00	0.30	112.50
	PLR	Telephone conference with Attorney Eric Lam regarding Foundation.	375.00	0.40	150.00
	PLR	Receive and review proposed Orders from Attorney Roy Leaf.	375.00	1.20	450.00

Statement Date: 04/15/2024
Statement No. 123219
Account No. 100082.0

Mercy Pensioners Committee

			Rate	Hours	
11/07/2023	JGQ	Draft Application to Employ Counsel for Official Committee of Pensioners and Declaration regarding same; send same to Attorney Paula Roby for review.	150.00	0.50	75.00
	PLR	Receive and review docket numbers 456, 457, 459, and 464.	375.00	2.10	787.50
	PLR	E-mail correspondence with Attorney Daniel Simon regarding meeting between Debtors and Official Committee of Pensioners.	375.00	0.30	112.50
	PLR	Receive and review Withdrawal of Bondholder, Motion to Compel Compliance; Order Cancelling Hearing on same.	375.00	0.30	112.50
	PLR	E-mail correspondence regarding Financial Advisor needs; receive and review Order on Application to Employ Day, Rettig, Martin P.C.	375.00	0.10	37.50
	PLR	Receive and review Amended Schedules to Asset Purchase Agreement; compare with original.	375.00	0.60	225.00
	PLR	E-mail correspondence regarding retaining Financial Advisor.	375.00	0.30	112.50
	PLR	Receive and review Proceeding Memo regarding 11/7/23 Hearing.	375.00	0.20	75.00
	PLR	Receive and review Order on Motion to Extend.	375.00	0.10	37.50
	PLR	Receive and review Order Granting Motion for Information Sharing Procedures.	375.00	0.40	150.00
	PLR	Receive and review Order Granting Debtors' Motion for Cash Collateral, Adequate Protection, Other Relief.	375.00	0.40	150.00
	PLR	Receive and review Order Approving Motion to Sell.	375.00	1.10	412.50
	PLR	Receive and review Order Approving Settlement Among Debtors, Bondholders, Committee, and Mercy Foundation.	375.00	0.50	187.50
11/08/2023	JGQ	Finalize and file Application to Employ Counsel for Official Committee of Pensioners.	150.00	0.20	30.00
	PLR	E-mail correspondence with Attorney Eric Lam regarding amount still in the Foundation after Order Approving Settlement.	375.00	0.70	262.50
	PLR	Review Settlement documents.	375.00	0.60	225.00
	PLR	Review and approve Application to Employ Day, Rettig, Martin P.C. as Counsel for Official Committee of Pensioners for filing.	375.00	0.20	75.00
	PLR	Attention to Potential Causes of Action.	375.00	1.60	600.00
11/09/2023	JGQ	Draft proposed Order for Application to Employ Counsel for Official Committee of Pensioners; send same to Attorney Paula Roby for review; finalize and send to Court for consideration.	150.00	0.30	45.00
	PLR	Receive and review full list of Pensioners from Debtors; forwarded same to Official Committee of Pensioners.	375.00	0.90	337.50
	PLR	Participate in Zoom meeting regarding meeting with Attorneys Daniel Simon and Roy Leaf regarding case status and concerns of Pensioners.	375.00	0.50	187.50
	PLR	Participate in Official Committee of Pensioners meeting.	375.00	1.90	712.50
	PLR	Participate in telephone call with Debtors.	375.00	0.70	262.50
	PLR	Receive and review several Applications for Compensation filed by the Unsecured Creditors Committee professionals.	375.00	0.60	225.00
	PLR	E-mail correspondence with Attorney Robert Gainer regarding meeting.	375.00	0.30	112.50
11/10/2023	PLR	Receive and review Pension documents from Debtors.	375.00	4.60	1,725.00
	PLR	Receive and review e-mail correspondence from Ron Winters.	375.00	0.10	37.50
	PLR	Receive and review Applications for Compensation filed by Debtors.	375.00	1.10	412.50

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Mercy Pensioners Committee

			Rate	Hours	
11/12/2023	PLR	Telephone conference with Attorney Roy Leaf regarding Pension issues.	375.00	0.40	150.00
	PLR	Attention to options for Pension Plan moving forward.	375.00	2.10	787.50
	PLR	Review Principal documents.	375.00	0.60	225.00
	PLR	Telephone call with Marc Ross regarding Principal documents.	375.00	0.30	112.50
11/13/2023	PLR	Continue with document review.	375.00	1.40	525.00
	PLR	Receive and review Order Approving Application to Employ Day, Rettig, Martin P.C. for Official Committee of Pensioners.	375.00	0.20	75.00
	PLR	Legal research regarding Iowa Law Controlling Church Plans.	375.00	2.30	862.50
11/14/2023	PLR	Telephone conference with Attorney Robert Gainer regarding Unsecured Creditors' Committee and Pension interaction, case background.	375.00	0.40	150.00
	PLR	E-mail correspondence with Official Committee of Pensioners regarding attempts to solicit Pensioners by third-party.	375.00	0.40	150.00
	PLR	Telephone call to Solicitor regarding attempt to solicit Pensioners.	375.00	0.50	187.50
	PLR	Draft letter to Employee Retirement Advisors; (.30) draft e-mail to all Pensioners regarding same. (.30)	375.00	0.60	225.00
11/15/2023	PLR	Attention to Pensioners' service issues.	375.00	0.40	150.00
	PLR	E-mail correspondence regarding 457 B status.	375.00	0.50	187.50
	PLR	Attention to H2C Securities Application for Compensation.	375.00	0.20	75.00
	PLR	Correspondence with Official Committee of Pensioners regarding Scheduling.	375.00	0.50	187.50
11/16/2023	PLR	Receive and review ToneyKorpf support document regarding Application for Compensation.	375.00	0.40	150.00
	PLR	Receive and review Motion to Reconsider and Order Setting Hearing.	375.00	0.40	150.00
	PLR	Attention to status of Foundation funds.	375.00	0.60	225.00
11/21/2023	PLR	Receive and review of Monthly Operation Reports filed by Debtors.	375.00	1.50	562.50
	PLR	Correspondence with Attorney Roy Leaf regarding Pension issues.	375.00	0.20	75.00
	PLR	Prepare for Official Committee of Pensioners meeting.	375.00	0.80	300.00
	PLR	Call with Marc Ross regarding Pension Committee formation and Financial Advisor needs.	375.00	1.00	375.00
11/22/2023	PLR	Participate in Official Committee of Pensioners meeting to provide update; discuss next steps.	375.00	2.50	937.50
	PLR	Correspondence with Attorney Roy Leaf regarding Motion to Continue; reviewed attached proposed Order.	375.00	0.20	75.00
	PLR	Receive and review Order on Motion to Continue.	375.00	0.10	37.50
	PLR	Receive and review full list of Pensioners; correspondence with Official Committee of Pensioners regarding same.	375.00	1.30	487.50
	PLR	Receive and review United States Trustee Comment filed.	375.00	0.20	75.00
11/24/2023	PLR	Receive and review United States Trustee Objection to McDermott, Will, and Emery LLP Application for Compensation.	375.00	0.30	112.50
	PLR	Review and Approve Official Committee of Pensioners Update.	375.00	0.50	187.50

Statement Date: 04/15/2024
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Mercy Pensioners Committee

			Rate	Hours	
11/27/2023	PLR	E-mail correspondence with Attorney Nathan Coco regarding path forward.	375.00	0.30	112.50
	PLR	E-mail correspondence with Attorney Daniel Simon regarding Pension Issues, Plan, and meeting.	375.00	0.30	112.50
	PLR	Legal research regarding Treatment of Plan under Iowa Trust Law.	375.00	1.90	712.50
	PLR	Attention to follow up items from telephone calls.	375.00	0.50	187.50
11/28/2023	PLR	Receive and review Order on Motion to Extend Time to Assume or Reject Unexpired Leases.	375.00	0.30	112.50
	PLR	Review case law regarding Benefits as Wages.	375.00	1.20	450.00
11/29/2023	PLR	Receive and review draft Term Sheet and proposed Waterfall from Bondholder.	375.00	1.20	450.00
	PLR	Continue review of Order on Motion to Extend Time to Assume or Reject Unexpired Leases.	375.00	0.10	37.50
	PLR	Receive and review Notice of Hearing on Final Cash Collateral Order.	375.00	0.10	37.50
11/30/2023	PLR	Telephone call with Bondholder representatives and attorney for same regarding Exclusivity, background, and Bondholder plan proposal.	375.00	0.60	225.00
	PLR	Prepare Official Committee of Pensioners update.	375.00	1.30	487.50
	PLR	Telephone call with Marc Ross regarding Financial Advisor position; case background.	375.00	1.20	450.00
	PLR	Revise Notice regarding Cash Collateral.	375.00	0.20	75.00
	PLR	Work on Term Sheet Counter Proposal.	375.00	0.80	300.00
		For Current Services Rendered		69.50	25,680.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Paula L Roby	67.80	\$375.00	\$25,425.00
Julie G. Quist	1.70	150.00	255.00

Total Current Work 25,680.00

Balance Due \$25,680.00

Please make all checks payable to Day Rettig Martin, P.C. Thank you.

Counsel for Mercy Pensioners Committee SUMMARY OF SERVICES BY PROJECT

November 4 - 30 2023

A. Asset Analysis and Recovery

Date	Tmkr	Hrs to Bill	Amount	Description
11/10/2023	PLR	4.60	1,725.00	Receive and review Pension documents from Debtors.
11/13/2023	PLR	2.30	862.50	Legal research regarding Iowa Law Controlling Church Plans.
11/27/2023	PLR	1.90	712.50	Legal research regarding Treatment of Plan under Iowa Trust Law.
11/29/2023	PLR	1.20	450.00	Receive and review draft Term Sheet and proposed Waterfall from Bondholder.
11/30/2023	PLR	0.20	75.00	Revise Notice regarding Cash Collateral.
11/30/2023	PLR	0.80	300.00	Work on Term Sheet Counter Proposal.
Totals:		11.00	4,125.00	

B. Case Administration

Date	Tmkr	Hrs to Bill	Amount	Description
11/05/2023	PLR	2.50	937.50	Background case filings review.
11/06/2023	PLR	1.20	450.00	Receive and review proposed Orders from Attorney Roy Leaf.
11/07/2023	PLR	0.30	112.50	Receive and review Withdrawal of Bond Holder, Motion to Compel Compliance; Order Cancelling Hearing on same.
11/14/2023	PLR	0.60	225.00	Draft letter to Employee Retirement Advisors; (.30) draft e-mail to all Pensioners regarding same. (.30)
11/15/2023	PLR	0.40	150.00	Attention to Pensioners' service issues.
11/15/2023	PLR	0.50	187.50	E-mail correspondence regarding 457 B status.
11/21/2023	PLR	0.80	300.00	Prepare for Official Committee of Pensioners meeting.
11/24/2023	PLR	0.50	187.50	Review and Approve Official Committee of Pensioners Update.
11/27/2023	PLR	0.50	187.50	Attention to follow up items from telephone calls.
Totals:		7.30	2,737.50	

C. Court Hearings

Date	Tmkr	Hrs to Bill	Amount	Description
11/05/2023	PLR	2.50	937.50	Prepare for 11/06/23 Hearing.
11/06/2023	JGQ	0.70	105.00	Prepare Hearing binder for Attorney Paula Roby.
11/06/2023	PLR	2.10	787.50	Participate in Hearing on Cash Collateral, Automatic Stay, Motion to Sell, Cash Management, and Rule 9019
Totals:		5.30	1,830.00	

D. Employment and Fee Applications

Date	Tmkr	Hrs to Bill	Amount	Description
11/06/2023	PLR	0.20	75.00	Attention to Application to Employ Day Rettig Martin, P.C. for Official Committee of
11/07/2023	JGQ	0.50	75.00	Draft Application to Employ Counsel for Official Committee of Pensioners and Declaration regarding same; send same to Attorney Paula Roby for review.
11/07/2023	PLR	0.10	37.50	E-mail correspondence regarding Financial Advisor needs; receive and review Order on Application to Employ Day Rettig Martin P.C.
11/08/2023	JGQ	0.20	30.00	Finalize and file Application to Employ Counsel for Official Committee of Pensioners.
11/08/2023	PLR	0.20	75.00	Review and approve Application to Employ Day, Rettig, Martin P.C. as Counsel for Official Committee of Pensioners for filing.
11/09/2023	JGQ	0.30	45.00	Draft proposed Order for Application to Employ Counsel for Official Committee of Pensioners; send same to Attorney Paula Roby for review; finalize and send to Court for
Totals:		1.50	337.50	

F. Litigation Planning

Date	Tmkr	Hrs to Bill	Amount	Description
11/08/2023	PLR	1.60	600.00	Attention to Potential Causes of Action.
Totals:		1.60	600.00	

G. Meetings and Communications with Professionals

Date	Tmkr	Hrs to Bill	Amount	Description
11/04/2023	PLR	0.10	37.50	E-mail correspondence with United States Trustee's office.
11/04/2023	PLR	0.50	187.50	Continued e-mail correspondence with Official Committee of Pensioners.
11/05/2023	PLR	0.40	150.00	Correspondence with Attorney Eric Lam regarding Foundation issues.
11/06/2023	PLR	0.60	225.00	Correspondence with Committee regarding Hearing.
11/06/2023	PLR	0.70	262.50	Meet with Parties in Interest following Hearing.

11/06/2023	PLR	0.20	75.00	Receive and review correspondence from Ron Winters of Gibbins Advisors, LLC regarding Financial Advisor needs
11/06/2023	PLR	0.10	37.50	Receive and review correspondence from Attorney Jeffrey Goetz regarding Financial Advisor needs
11/06/2023	PLR	0.40	150.00	Receive and review full list of Pensioners from Debtors; forwarded same to Official Committee of Pensioners
11/06/2023	PLR	0.30	112.50	Correspondence with Official Committee of Pensioners regarding handling of list, mailings.
11/06/2023	PLR	0.40	150.00	Telephone conference with Attorney Eric Lam regarding Foundation.
11/07/2023	PLR	0.30	112.50	E-mail correspondence with Attorney Daniel Simon regarding meeting between Debtors and Official Committee of Pensioners
11/07/2023	PLR	0.30	112.50	E-mail correspondence regarding retaining Financial Advisor.
11/08/2023	PLR	0.70	262.50	E-mail correspondence with Attorney Eric Lam regarding amount still in the Foundation after Order Approving Settlement.
11/09/2023	PLR	0.90	337.50	Receive and review full list of Pensioners from Debtors; forwarded same to Official Committee of Pensioners.
11/09/2023	PLR	0.50	187.50	Participate in Zoom meeting regarding meeting with Attorneys Daniel Simon and Roy Leaf regarding case status and concerns of Pensioners.
11/09/2023	PLR	1.90	712.50	Participate in Official Committee of Pensioners meeting.
11/09/2023	PLR	0.70	262.50	Participate in telephone call with Debtors.
11/09/2023	PLR	0.30	112.50	E-mail correspondence with Attorney Robert Gainer regarding meeting.
11/10/2023	PLR	0.10	37.50	Receive and review e-mail correspondence from Ron Winters.
11/12/2023	PLR	0.40	150.00	Telephone conference with Attorney Roy Leaf regarding Pension issues.
11/12/2023	PLR	0.30	112.50	Telephone call with Marc Ross regarding Principal documents.
11/14/2023	PLR	0.40	150.00	Telephone conference with Attorney Robert Gainer regarding Unsecured Creditors' Committee and Pension interaction case background
11/14/2023	PLR	0.40	150.00	E-mail correspondence with Official Committee of Pensioners regarding attempts to solicit Pensioners by third-party
11/14/2023	PLR	0.50	187.50	Telephone call to Solicitor regarding attempt to solicit Pensioners.
11/15/2023	PLR	0.50	187.50	Correspondence with Official Committee of Pensioners regarding Scheduling.
11/21/2023	PLR	0.20	75.00	Correspondence with Attorney Roy Leaf.
11/21/2023	PLR	1.00	375.00	Call with Marc Ross regarding Pension Committee formation and Financial Advisor needs.
11/22/2023	PLR	2.50	937.50	Participate in Official Committee of Pensioners meeting to provide update; discuss next
11/22/2023	PLR	0.20	75.00	Correspondence with Attorney Roy Leaf regarding Motion to Continue; reviewed attached proposed Order.
11/22/2023	PLR	1.30	487.50	Receive and review full list of Pensioners; correspondence with Official Committee of Pensioners regarding same.
11/27/2023	PLR	0.30	112.50	E-mail correspondence with Attorney Nathan Coco regarding path forward.
11/27/2023	PLR	0.30	112.50	E-mail correspondence with Attorney Daniel Simon regarding Pension Issues, Plan, and
11/30/2023	PLR	0.60	225.00	Telephone call with Bondholder representatives and attorney for same regarding Exclusivity, background and Bondholder plan proposal.
11/30/2023	PLR	1.30	487.50	Prepare Official Committee of Pensioners update.
11/30/2023	PLR	1.20	450.00	Telephone call with Marc Ross regarding Financial Advisor position; case background.
Totals:		20.80	7,800.00	

H. Pension Analysis

Date	Tmkr	Hrs to Bill	Amount	Description
11/04/2023	PLR	0.60	225.00	Attention to status of Pension funds, lack of Trust account.
11/05/2023	PLR	0.40	150.00	Review Pension Plan Instrument regarding Trust.
11/12/2023	PLR	2.10	787.50	Attention to options for Pension Plan moving forward.
11/12/2023	PLR	0.60	225.00	Review Principal documents.
11/16/2023	PLR	0.60	225.00	Attention to status of Foundation funds.
11/28/2023	PLR	1.20	450.00	Review case law regarding Benefits as Wages.
Totals:		5.50	2,062.50	

J. Review Pleadings

Date	Tmkr	Hrs to Bill	Amount	Description
11/04/2023	PLR	2.10	787.50	Review First Day Motions.
11/04/2023	PLR	0.10	37.50	Receive and review United States Trustee's Appointment of Official Committee of Pensioners.
11/05/2023	PLR	1.40	525.00	Receive and review of filings including Motion in Limine, Witness and Exhibit Lists, Response to Objection filed by Bond Holder Declaration
11/07/2023	PLR	2.10	787.50	Receive and review docket numbers 456, 457, 459, and 464.
11/07/2023	PLR	0.60	225.00	Receive and review Amended Schedules to Asset Purchase Agreement; compare with

11/07/2023	PLR	0.20	75.00	Receive and review Proceeding Memo regarding 11/7/23 Hearing.
11/07/2023	PLR	0.10	37.50	Receive and review Order on Motion to Extend.
11/07/2023	PLR	0.40	150.00	Receive and review Order Granting Motion for Information Sharing Procedures.
11/07/2023	PLR	0.40	150.00	Receive and review Order Granting Debtors' Motion for Cash Collateral, Adequate Protection, Other Relief
11/07/2023	PLR	1.10	412.50	Receive and review Order Approving Motion to Sell.
11/07/2023	PLR	0.50	187.50	Receive and review Order Approving Settlement Among Debtors, Bondholders, Committee, and Mercy Foundation.
11/08/2023	PLR	0.60	225.00	Review Settlement documents.
11/09/2023	PLR	0.60	225.00	Receive and review several Applications for Compensation filed by the Unsecured Creditors Committee professionals.
11/10/2023	PLR	1.10	412.50	Receive and review Applications for Compensation filed by Debtors.
11/13/2023	PLR	1.40	525.00	Continue with document review.
11/13/2023	PLR	0.20	75.00	Receive and review Order Approving Application to Employ Day, Rettig, Martin P.C. for Official Committee of Pensioners.
11/15/2023	PLR	0.20	75.00	Attention to H2C Securities Application for Compensation.
11/16/2023	PLR	0.40	150.00	Receive and review ToneyKorpf support document regarding Application for Compensation.
11/16/2023	PLR	0.40	150.00	Receive and review Motion to Reconsider and Order Setting Hearing.
11/21/2023	PLR	1.50	562.50	Receive and review of Monthly Operation Reports filed by Debtors.
11/22/2023	PLR	0.10	37.50	Receive and review Order on Motion to Continue.
11/22/2023	PLR	0.20	75.00	Receive and review United States Trustee Comment filed.
11/24/2023	PLR	0.30	112.50	Receive and review United States Trustee Objection to McDermott, Will, and Emery LLP Application for Compensation
11/28/2023	PLR	0.30	112.50	Receive and review Order on Motion to Extend Time to Assume or Reject Unexpired Leases.
11/29/2023	PLR	0.10	37.50	Continue review of Order on Motion to Extend Time to Assume or Reject Unexpired Leases.
11/29/2023	PLR	0.10	37.50	Receive and review Notice of Hearing on Final Cash Collateral Order.
Totals:		16.50	6,187.50	

	Hrs to Bill	Amount
Grand Totals:	69.50	25,680.00
80%:		20,544.00